

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

PATRICK BRADY, et al.,

Plaintiffs,

v.

AIR LINE PILOTS ASSOCIATION,
INTERNATIONAL,

Defendant.

Civil Action No. 02-2917 (JEI)

Oral Argument Requested

Motion Date: November 19, 2012

**CERTIFICATION OF JOHN C. CONNELL, ESQUIRE,
IN SUPPORT OF
AIR LINE PILOTS ASSOCIATION, INTERNATIONAL'S
MOTION FOR LEAVE TO AMEND ANSWER**

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Attorneys for Defendant Air Line Pilots Association, International

JOHN C. CONNELL, ESQUIRE, hereby certifies as follows:

1. I am a member of the Bar of this Court and am a Shareholder in the law firm of Archer & Greiner, P.C., attorneys for Defendant, Air Line Pilots Association, International (“ALPA”). I share responsibility for the handling of this matter, and have personal knowledge of the information set forth herein. As such, I am authorized to make this Certification.

2. I am submitting this Certification in support of Defendant’s Motion for Leave to Amend Its Answer to include mitigation of damages as an affirmative defense.

3. Attached hereto as Exhibit “A” is a true and correct copy of the proposed Amended Answer ALPA intends to file if the Court grants the instant Motion.

4. The only changes between ALPA’s original Answer and the proposed Amended Answer are an updated caption, the addition of new counsel, and the following affirmative defense:

7. Plaintiffs have failed to mitigate their damages.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 23, 2012

/s/ John C. Connell
JOHN C. CONNELL, ESQUIRE

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